

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY  
CAMDEN**

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In re:	:	<b>Chapter 13</b>
	:	
Shane A. Jimenez,	:	<b>Case No. 23-10176</b>
	:	
	:	<b>Hearing Date: May 9, 2023 at 10:00 A.M.</b>
	:	
	:	<b>Judge: Honorable Andrew B Altenburg, Jr.</b>
<b>Debtor(s).</b>	:	
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**NOTICE OF MOTION TO OBJECT TO PROOF OF CLAIM 6 OF US BANK NATIONAL  
ASSOCIATION, ET AL**

To all parties on the attached Certification of Service.

**PLEASE TAKE NOTICE** that on May 9, 2023, at 10:00 A.M. or as soon thereafter as counsel may be heard, the undersigned attorney for the Debtor, will move before the Honorable Andrew B Altenburg, Jr., sitting in the United States Bankruptcy Court, United States Courthouse, 401 Market Street, Camden, NJ 08101, for an Order Amending Proof Of Claim 6-1 of US Bank National Association not in its individual capacity but solely as Trustee for RMTP Trust, Series 2021 BKM-TT-V.

**YOUR RIGHTS MAY BE AFFECTED.** You should read these papers carefully and discuss them with your attorney, if you have one, in this bankruptcy case. If you do not have an attorney, you may wish to consult one.

If you want the Court to consider your views on the motion, then seven (7) days before the return date of 5/9/2023, you or your attorney must:

File with the Court a written response explaining your position at:

United States Bankruptcy Court  
District of New Jersey - **CAMDEN** Vicinage  
United States Courthouse  
401 Market Street  
Camden, NJ 08101

If you mail your response to the Court for filing, you must mail it early enough so the Court will receive it on or before the date state above. You must also mail a copy to:

Thomas G. Egner, Esq.  
McDowell Law, PC  
46 West Main Street  
Maple Shade, NJ 08052

Isabel C. Balboa, Esquire, Chapter 13 Trustee  
Cherry Hill Corporate Center  
535 Route 38, Suite 580  
Cherry Hill, NJ 08002

Attend the hearing to be held on May 9, 2023, at 10:00 A.M., at the United States Bankruptcy Court, United States Courthouse, 401 Market Street, Camden, NJ 08101.

**TAKE FURTHER NOTICE** that the answering papers and briefs, if necessary, or a statement that no answering brief is necessary and the basis thereof, shall be filed seven (7) days before the date noticed for argument. This Motion/Application shall be deemed uncontested unless responsive papers are filed seven (7) days prior to the date of this Motion/Application and state with particularity the basis for the opposition.

If you do not take these steps, the Court may decide that you do not oppose the entry of the relief sought in the Motion/Application and may enter an order granting the relief sought.

**STATEMENT AS TO WHY NO BRIEF IS NECESSARY IN ACCORDANCE WITH  
D.N.J. LBR 9013-2**

This Motion/Application requests an Order Amending Proof Of Claim 6-1 of US Bank National Association not in its individual capacity but solely as Trustee for RMTP Trust, Series 2021 BKM-TT-V.

The facts relied on by the Debtor/Petitioner that are set forth in this Motion do not present complicated questions of fact or unique questions of law. Therefore, no brief is necessary for the Court's consideration of this Motion/Application.

McDowell Law, PC

Dated: April 4, 2023

By: /s/ Thomas G. Egner  
**Thomas G. Egner, Esq.**  
Attorney for the Debtor(s)